

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL No. 3:16-md-02738-MAS-RLS

This Document Relates To All Cases

**NOTICE OF MOTION TO EXCLUDE THE OPINIONS OF DRS. DAVID
KESSLER, LAURA PLUNKETT, WILLIAM SAGE, AND GEORGE
NEWMAN**

PLEASE TAKE NOTICE that on a date to be determined by the Court, the undersigned counsel will bring Defendants Johnson & Johnson and LLT Management, LLC (“Defendants”)’s Motion to Exclude the Opinions of Drs. David Kessler, Laura Plunkett, William Sage, and George Newman before this Court. Defendants will ask for entry of an order that excludes Drs. Kessler’s, Plunkett’s, Sage’s, and Newman’s opinions in full.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Defendants shall rely upon the Brief submitted herewith and the Declaration of Jessica Davidson, Esq., together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted

herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: July 23, 2024

Respectfully submitted,

/s/ Susan M. Sharko

Susan M. Sharko

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